

EXHIBIT

18

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,)
INC.,)
)
Plaintiff,)
)
v.)
)
UNIVERSITY OF NORTH CAROLINA,)
et al.,)
)
Defendants,)
)
and)
)
LUIS ACOSTA; ANDREW BRENNAN,)
CHRISTOPHER JACKSON on behalf of)
C.J.; RAMONIA JONES on behalf of R.J.;)
JULIA NIEVES on behalf of I.N.; ANGIE &)
KEVIN MILLS on behalf of Q.M.; LAURA)
ORNELAS; CECILIA POLANCO;)
TAMIKA WILLIAMS on behalf of A.J.;)
and STAR WINGATEBEY)
)
)
Defendant-Intervenors.)
)

DECLARATION OF DIANDRA ANNA-KAY DWYER

Diandra Anna-Kay Dwyer, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Diandra Anna-Kay Dwyer, I am over 18 years of age, and I am fully competent to make this declaration.

2. I am a full-time undergraduate student at UNC-Chapel Hill. I am in my third year and am pursuing a major in Journalism and Mass Communication and a minor in Japanese.

3. I am black/Jamaican.

4. I am a first-generation college student and a part of a working class family. Without my full-ride, merit scholarship, it would be difficult or impossible for me to attend college.

5. I first heard about UNC when I was a junior in high school. It had an excellent reputation for academics. I was interested in Journalism, and the Journalism department at UNC was considered one of the best in the nation. UNC was also closer to my home than many schools of its caliber. I chose UNC because of these reasons, as well as its commitment to student diversity and the excellent scholarship award I was offered.

6. I have found the racial and ethnic diversity at UNC-Chapel Hill to be very enriching. The varying viewpoints and perspectives in class discussions helps us all to not be judgmental of each other and have deeper, fuller discussions; we understand that we all have different backgrounds. I also appreciate how the diversity of the student body helps lessen tokenization. Because there is such diversity of personal experience, classmates are more easily able to find strands of similarity to which they can relate, even if they come from different backgrounds.

Diversity makes my educational experience more valuable in every subject. Individually, we are each limited in our ability to understand any particular topic—the lens we view the world through limits the scope of learning available to each of us. When we approach a topic together, in all our diversity of experience, we gain a new context for learning the subject at hand. I know that I have been able to develop better, more complex frameworks for each subject I have learned by the interchange of different approaches. Without this diversity of understanding, my educational experience would not have been as rich or as rigorous.

I have also appreciated that during class discussions about race, discrimination, and privilege, I have regularly heard people of various ethnic backgrounds defending others (no matter if their backgrounds are the same or not) and speaking up against ideas that have historically oppressed people.

7. One night I was walking on Franklin Street, in downtown Chapel Hill, right off the UNC-Chapel Hill campus. Franklin Street was closed to traffic in that area, so people were walking in the street and across it as is common. There was a group of three Black women crossing Franklin Street near a crosswalk. I saw a white police officer grab one of the women and physically push her into the crosswalk in what seemed to be an angry outburst. I was shocked to see the police officer put his hands on this woman for no apparent reason. I knew that I looked like the women in that group, and I felt that the police officer would have felt as free to push me. This experience shook me, and I still remember it. At the same time, I did not feel that my reaction to this experience was one

that most people on campus would understand. The experience was particularized to me as a woman of color, and specifically a black woman.

8. I am from Jamaica, and there are not too many Caribbean students on the UNC campus. I have been involved in the creation of a Caribbean Students Association, open to all, in order to further understanding and cultural exchange and awareness of issues specific to Caribbean students.

9. I have been very proud of UNC and the open-mindedness of its student body in my time here. In my experience, individuals are much more likely to make insensitive remarks online. In particular, I have seen insensitive responses to concerns raised by students of color about the statute of the confederate soldier "Silent Sam" and an incident on campus when trucks flying confederate flags drove around campus. I saw online questioning of Black student's pain and anger about these issues, comments about Black students overreacting and needing to, in effect, get over it. Those comments revealed a gap between different students' understanding of racism and its effects on the student body.

Adding to this tension is the lack of definitive responses on the part of the administration. Although UNC-Chapel Hill has undergone recurrent bouts of conversation about issues of race, the administration has continually stopped short of taking a stand against racism. This leaves students of color wondering why not? Is the Administration afraid of making such statements and why?

Although UNC has discussed and continues to discuss race on campus, there has yet to be an institutional resolution of the current debates.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 9th day of May, 2017.

Diandra Anna-Kay Dwyer
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